

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

REGINA CAMP EL, Individually; HARUN BEY, Individually; AHMARI CAMP BEY, Individually; AHMIR CAMP EL, Individually; REGINA CAMP EL, as Parent and Natural Guardian of A.C.E. a minor, Individually; and REGINA CAMP EL, as Parent and Natural Guardian of A. S.E., a minor, Individually,

Civil Action No.: 21-cv-1636

Plaintiffs,

vs.

CITY OF PITTSBURGH operating the
PITTSBURGH BUREAU OF POLICE, *et al.*,

Defendants.

PLAINTIFFS' MOTION FOR SETTLEMENT APPROVAL

AND NOW, comes the Plaintiffs, by and through their undersigned counsel, and files the within Motion for Settlement Approval, averring as follows:

1. The Parties agreed to resolve this matter on or about January 18, 2023 during the Post-Discovery Settlement Conference with this Honorable Court, which is keenly aware of the facts associated with Plaintiffs' claims.
2. A global settlement in the amount of \$225,000.00 was reached in this matter.
3. Given that the claims at issue in this matter involve claims for Minors, the Plaintiffs seek approval of this settlement pursuant to LCvR 17.1 of the Local Rules for the Western District of Pennsylvania.
4. To amicably resolve this matter, counsel for the Plaintiffs have agreed to a compromise of their fee and cost reimbursement and accept \$50,000.00 of the \$225,000.00 for

their interests, work, and reimbursement of costs in this case.

5. Accordingly, the remaining balance of \$175,000.00 shall be distributed to the Plaintiffs family in accordance with their agreed requests.

6. Given that the facts of this case involve claims for discrimination based upon Plaintiffs' status as Moorish Nationals, Plaintiffs have agreed collectively to have the balance of the settlement funds paid to their non-profit Ministry, which shall provide benefits for all Plaintiffs, including Minor Plaintiffs, who were not physically injured nor received any treatment as a result of the conduct of the Defendants in this case.

7. All interested parties agree that the amount of attorney's fees and costs related to this case are fair and reasonable, and that the requests of the family are to be honored.

8. The undersigned therefore requests the approval of the settlement in this matter.

Respectfully submitted,

By: /s/ Max Petrunya

MAX PETRUNYA, ESQUIRE

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of April 2023, I served the foregoing papers on all counsel of record by filing them in the Court's ECF filing system, which served papers on counsel of record.

By: /s/ Max Petrunya
MAX PETRUNYA, ESQUIRE